

STATE OF MINNESOTA)
)
COUNTY OF HENNEPIN) ss. AFFIDAVIT OF TRAVIS WILMER

Your affiant, Travis Wilmer, being duly sworn, does state the following is true and correct to the best of his knowledge and belief:

1. I have been employed as a Special Agent with the Federal Bureau of Investigation (FBI) since November 8, 2021.

2. As a Special Agent, my primary duties and responsibilities consist of conducting investigations of individuals and businesses for possible violations of federal laws. I am presently assigned to the FBI's Minneapolis, Minnesota field office where I am a member of the Civil Rights and Public Corruption Squad.

3. During my employment as a Special Agent, I have conducted and participated in investigations of varying degrees involving mail fraud, wire fraud, fraud against the government, money laundering, and other criminal acts, including criminal schemes where individuals misappropriate money from the investing public.

4. This affidavit is submitted for the limited purpose of establishing probable cause in support of issuing a complaint and arrest warrant for MEKFIRA HUSSEIN for federal programs bribery, in violation of Title 18, United States Code, Section 666.

5. This affidavit is based on my personal knowledge, interviews of witnesses, physical surveillance, information received from other law enforcement agents, my experience and training, and the experience of other agents. Because this affidavit is being submitted for the limited purpose of establishing probable cause in

support of the requested complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that MEKFIRA HUSSEIN has committed violations of Title 18, United States Code, Section 666.

I. PROBABLE CAUSE

A. HUSSEIN is a Target of a Federal Investigation of a Scheme to Misappropriate Millions of Dollars in Federal Child Nutrition Program Funds

6. MEKFIRA HUSSEIN, who resides in Shakopee, Minnesota, is one of the targets of the continuing investigation into a scheme to fraudulently obtain and misappropriate millions of dollars in federal child nutrition program funds. HUSSEIN and others obtained, misappropriated, and laundered program funds that were intended as reimbursements for the cost of serving meals to children. HUSSEIN and others exploited changes in the program intended to ensure underserved children received adequate nutrition during the Covid-19 pandemic. Rather than feed children, HUSSEIN and others exploited the Covid-19 pandemic—and the resulting program changes—to enrich themselves by fraudulently misappropriating federal child nutrition program funds, which they spent for their own personal benefit on such expenditures as vehicles.

7. On the evening of Saturday, September 17, 2022, investigators learned that HUSSEIN booked a one-way flight to Addis Ababa, Ethiopia. HUSSEIN's flight is scheduled to depart Minneapolis-St. Paul International Airport at approximately 6:32 p.m. on September 20, 2022.

B. The Federal Child Nutrition Programs

8. This complaint for an arrest warrant relates to an ongoing investigation into a scheme to defraud United States Department of Agriculture (USDA) programs that provide federal funding to nutrition programs for children and low-income individuals across the nation. The Food and Nutrition Service is an agency of the United States Department of Agriculture (USDA) that administers various federal child nutrition programs, including the Summer Food Service Program and Child and Adult Care Food Program (together “the Federal Child Nutrition Program”).

9. The Summer Food Service Program is a federal program established to ensure that children continue to receive nutritious meals when school is not in session. The Summer Food Service Program reimburses non-profit organizations and other participating entities that serve free healthy meals and snacks to children and teens in low-income areas.

10. The Child and Adult Care Food Program is a federal program that reimburses non-profit organizations and other participating entities that serve healthy meals and snacks to children and adults at participating childcare centers, day care homes, and after-school programs.

11. The Federal Child Nutrition Program operates throughout the United States. The USDA’s Food and Nutrition Service administers the program at the national and regional levels by distributing federal funds to state governments, which provide oversight over the Federal Child Nutrition Program.

12. The Minnesota Department of Education (MDE) administers the Federal Child Nutrition Program in Minnesota.

13. Meals funded by the Federal Child Nutrition Program are served by “sites.” Each site participating in the Federal Child Nutrition Program must be sponsored by a sponsoring organization that is authorized to participate in the Federal Child Nutrition Program. Sponsors are required to submit an application to MDE for each site. Sponsors are responsible for monitoring each of their sites and preparing reimbursement claims for their sites.

14. Sponsors submit reimbursement claims to MDE on behalf of sites under their sponsorship. The USDA then provides federal reimbursement funds on a per-meal basis. MDE provides the federal funds to the sponsoring agency, which in turn pays the reimbursement to the sites under its sponsorship. The sponsoring agency retains 10 to 15 percent of the funds as an administrative fee in exchange for sponsoring the sites, submitting reimbursement claims, and disbursing the federal funds.

15. Historically, the Federal Child Nutrition Program has generally functioned by providing meals to children involved in educational-based programs or activities. During the Covid-19 pandemic, however, the USDA waived some of the standard requirements for participation in the Federal Child Nutrition Program. Among other things, USDA allowed for-profit restaurants to participate in the program. It also allowed for off-site food distribution to children outside of educational programs. At the same time, the state government’s stay-at-home order and telework policies made it more difficult to oversee the program. These changes left the program vulnerable to fraud and abuse.

C. Feeding Our Future

16. Feeding Our Future was a Minnesota non-profit organization purportedly in the business of helping community partners participate in the Federal Child Nutrition Program. Aimee Bock was the founder and executive director of Feeding Our Future. Feeding Our Future was an approved sponsor of the Federal Child Nutrition Program.

17. Prior to the onset of the Covid-19 pandemic, Feeding Our Future was a small non-profit that sponsored the participation of Minnesota daycares and after school programs in the Federal Child Nutrition Program.

18. Beginning in approximately April 2020, Feeding Our Future dramatically increased the number of sites under its sponsorship as well as the amount of Federal Child Nutrition Program funds received by those sites. Feeding Our Future went from receiving and disbursing approximately \$3.4 million in federal funds to sites under its sponsorship in 2019 to nearly \$200 million in 2021.

19. Aimee Bock oversaw a scheme to defraud, carried out by sites under the sponsorship of Feeding Our Future. Aimee Bock and Feeding Our Future sponsored entities that submitted fraudulent reimbursement claims and fake documentation. In 2020 and 2021, Aimee Bock and her company sponsored the opening of more than 250 Federal Child Nutrition Program sites, knowing that the sites were submitting fraudulent claims.

20. In exchange for sponsoring the sites' fraudulent participation in the program, Feeding Our Future received nearly \$18 million in Federal Child Nutrition Program funds as administrative fees in 2021. Because the amount of administrative

fees it received was based on the amount of federal funds received by sites under its sponsorship, Feeding Our Future received millions of dollars in administrative fees to which it was not entitled, due to its sponsorship and facilitation of fraudulent sites participating in the program.

21. In addition to receiving tens of millions of dollars in administrative fees, Feeding Our Future employees solicited and received bribes and kickbacks from individuals and sites under the sponsorship of Feeding Our Future. In effect, Feeding Our Future operated a “pay-to-play” scheme in which individuals seeking to operate fraudulent sites under the sponsorship of Feeding Our Future had to kick back a portion of their fraudulent proceeds to Feeding Our Future employees. Many of these kickbacks were paid in cash or disguised as “consulting fees” paid to shell companies created by Feeding Our Future employees to conceal the true nature of the payments and to make them appear legitimate.

22. On or about September 13, 2022, a federal grand jury returned six sealed indictments charging more than 40 defendants with participating in a scheme to defraud the Federal Child Nutrition Program. Specifically, in *United States v. Bock et al.*, 22 CR 223 (MJD/DTS), Aimee Bock and another Feeding Our Future employee, Abdikerm Eidleh, were among the defendants charged. In addition to being charged with conspiracy to commit wire fraud, both Bock and Eidleh were also charged with conspiracy to solicit and receive kickbacks in violation of 18 U.S.C. §§ 371 and 666. The indictment alleges that “[e]mployees of Feeding Our Future solicited and accepted bribes and kickbacks from individuals who opened Federal

Child Nutrition Program sites under the sponsorship of Feeding Our Future.” The indictment further alleges that “[i]ndividuals who ran sites under the sponsorship of Feeding Our Future paid bribes and kickbacks to Feeding Our Future employees. Many of these bribes and kickbacks were disguised as consulting payments or other legitimate payments to shell companies created by Feeding Our Future employees.”

23. The indictment identified several entities that Eidleh created and used to receive and conceal bribe and kickback payments, including:

a. Bridge Consulting and Logistics LLC, a company that Eidleh registered on or about November 24, 2020;

b. Bridge Logistics LLC, a company that Eidleh registered on or about December 4, 2020;

c. Hope Suppliers LLC, a company that Eidleh registered on or about December 14, 2020.

24. A review of bank records shows that Eidleh opened accounts on behalf of these entities and used them to receive more than \$3 million in kickbacks from entities participating in the Federal Child Nutrition Program under the sponsorship of Feeding Our Future.

D. The Defendant MEKFIRA HUSSEIN and her Role

25. The investigation has revealed that MEKFIRA HUSSEIN, among other conduct, paid bribes and kickbacks to Eidleh. HUSSEIN is the president of Shamsia Hopes, a Minnesota company that received more than \$6.8 million in Federal Child Nutrition Program funds from Feeding Our Future in 2020 and 2021.

26. According to Minnesota Secretary of State records, Shamsia Hopes is a nonprofit corporation located at 6802 Humboldt Ave N in Brooklyn Center, Minnesota. The registered agent address is HUSSEIN's residence located at 6142 Oxford Rd N, Shakopee, Minnesota.

27. On or about October 9, 2020, MEKFIRA HUSSEIN and Aimee Bock applied to enroll Shamsia Hopes as a Federal Child Nutrition Program site under the sponsorship of Feeding Our Future. The application stated that the Shamsia Hopes site had an address at 580 University Avenue W in St. Paul, Minnesota. The application did not expressly state where Shamsia Hopes intended to operate its Federal Child Nutrition Program site. However, the application did include a map for the location 2885 Brookdale Drive in Brooklyn Park, Minnesota.

28. Bock and MEKFIRA HUSSEIN signed and certified the October 9, 2020 application by acknowledging, among other things, that the "agreement is for receipt of federal funds and deliberate misrepresentation may subject us to prosecution under applicable state and federal criminal statutes," as follows:

CERTIFICATION			
The authorized representatives of PROGRAM and FEEDING OUR FUTURE certify that PROGRAM and FEEDING OUR FUTURE will comply with all rights and responsibilities outlined in this Agreement. We understand the Agreement may be terminated by either party with written notice. We understand this agreement is for receipt of federal funds and deliberate misrepresentation may subject us to prosecution under applicable state and federal criminal statutes. PROGRAM representative certifies that PROGRAM is not participating in the CACFP under any other sponsoring organization.			
AUTHORIZED REPRESENTATIVES			
The individuals signing below have authorization to commit the PROGRAM and FEEDING OUR FUTURE to legal and binding agreements.			
Program Name	PROGRAM	Shamsia Hopes	
Representative	MEKFIRA HUSSEIN	Title	president
Signature	<i>[Signature]</i>	Date	10/9/20
Sponsoring Organization	FEEDING OUR FUTURE		
Representative	AIMEE BOCK	Title	FOUNDER/EXECUTIVE DIRECTOR
Signature	<i>[Signature]</i>	Date	10.9.20


29. On or about November 9, 2020, a representative from MDE emailed Bock to inquire where Shamsia Hopes would be operating its Federal Child Nutrition Program site. The MDE representative pointed out that the "CACFP Agreement, Release, and Health Department letter [for Shamsia Hopes] have 580 University Ave in St Paul, but the eligibility map has 2885 Brookdale Drive." Approximately two days later, Bock responded to MDE and confirmed that the correct address for the Shamsia Hopes site was 2885 Brookdale Drive in Brooklyn Park, Minnesota.

30. Shamsia Hopes was approved as an enrolled site and, thereafter, MEKFIRA HUSSEIN began to submit meal counts to Feeding Our Future. For example, MEKFIRA HUSSEIN submitted meal count sheets claiming that the Shamsia Hopes Brookdale Drive site was serving breakfast to 5,000 children every day, seven days a week, in December 2020.


SUMMER MEAL COUNTS — CLICKER									
Sponsor	FEEDING OUR FUTURE		Email	james@feedingourfuture.org		Phone	612.345.4922		
Site	Shamsia Hopes		Supervisor	MEKFIRA HUSSEIN		Week of	12/20/20		
Meal Type	BREAKFAST		LUNCH						
Available Meals	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL	
Number of meals received/prepared	5000	5000	5000	5000	5000	5000	5000		
Number of meals from yesterday	0	0	0	0	0	0	0		
Meal Counts	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL	
Number of firsts served to children	5000	5000	5000	5000	5000	5000	5000		
Number of second meals served to children (not reimbursed)	0	0	0	0	0	0	0		
Number of meals served to program adults (not reimbursed)	20	0	0	20	0	0	20		
Number of meals served to non program adults (not reimbursed)	30	0	0	30	0	0	30		
Number of children requesting meals of food is gone	0	0	0	0	0	0	0		
Food	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL	
FOOD TEMPERATURE	NA	NA	NA	NA	NA	NA	NA		
Number of non-reimbursable, incomplete or damaged meals	0	0	0	0	0	0	0		
Number of leftover meals	0	0	0	0	0	0	0		
Initials of person taking daily meal count certifying that the information is true and accurate	MH	MH	MH	MH	MH	MH	MH		
SITE SUPERVISOR: By signing, I certify that the above information is true and accurate.									
Signature	[Signature]						Date	12/26/20	


31. As additional examples, MEKFIRA HUSSEIN submitted meal count sheets claiming that the Shamsia Hopes Brookdale Drive site was serving breakfast

to over 5,000 children and serving over 5,000 lunches to children everyday day, seven days a week, in March 2021.


 FEEDING OUR FUTURE

SUMMER MEAL COUNTS — CLICKER

Sponsor	FEEDING OUR FUTURE		Email			Phone	612.345.4922	
Site	Shamsia Hopes		Supervisor	MEKFIRA HUSSEIN		Week of	3/7/21	
Meal Type	BREAKFAST							
Available Meals	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
Number of meals received/prepared	5281	5310	5169	5188	5210	5219	5300	
Number of meals from yesterday	0	0	0	0	0	0	0	
Meal Counts	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
Number of firsts served to children	5089	5110	5069	5001	5006	5110	5188	
Number of second meals served to children (no receipt)	0	0	0	0	0	0	0	
Number of meals served to program adults (no receipt)	17	16	17	19	19	31	20	
Number of meals served to non-program adults (no receipt)	183	184	83	168	265	86	92	
Number of children requesting meals of food is gone	0	0	0	0	0	0	0	
Food	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
FOOD TEMPERATURE	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Number of non-reimbursable, incomplete or damaged meals	0	0	0	0	0	0	0	
Number of leftover meals	0	0	0	0	0	0	0	
Initials of person taking daily meal count certifying that the information is true and accurate	MH	MH	MH	MH	MH	MH	MH	
SITE SUPERVISOR: By signing, I certify that the above information is true and accurate.								
Signature							Date	3/14/21
This institution is an equal opportunity provider.								

 FEEDING OUR FUTURE

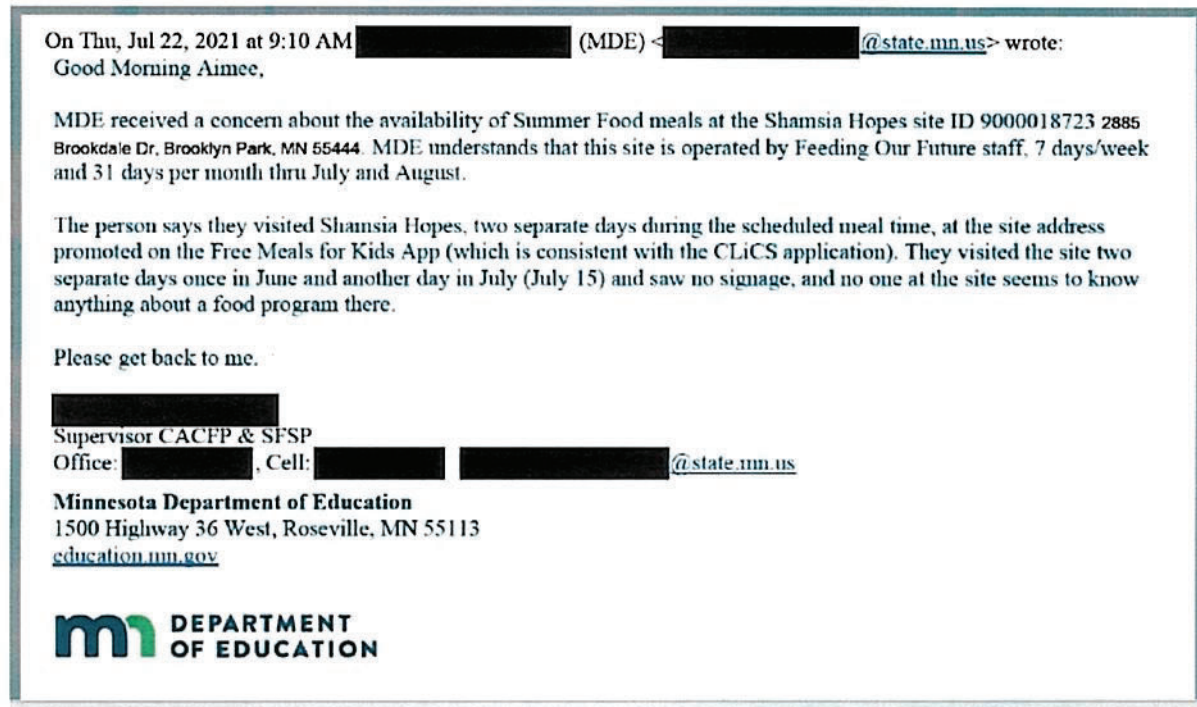
SUMMER MEAL COUNTS — CLICKER

Sponsor	FEEDING OUR FUTURE		Email			Phone	612.345.4922	
Site	Shamsia Hopes		Supervisor	MEKFIRA HUSSEIN		Week of	3/7/21	
Meal Type	LUNCH							
Available Meals	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
Number of meals received/prepared	5281	5310	5169	5188	5210	5219	5300	
Number of meals from yesterday	0	0	0	0	0	0	0	
Meal Counts	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
Number of firsts served to children	5089	5110	5069	5001	5006	5110	5188	
Number of second meals served to children (no receipt)	0	0	0	0	0	0	0	
Number of meals served to program adults (no receipt)	17	16	17	19	19	31	20	
Number of meals served to non-program adults (no receipt)	183	184	83	168	265	86	92	
Number of children requesting meals of food is gone	0	0	0	0	0	0	0	
Food	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
FOOD TEMPERATURE	181	159	182	177	168	183	166	
Number of non-reimbursable, incomplete or damaged meals	0	0	0	0	0	0	0	
Number of leftover meals	0	0	0	0	0	0	0	
Initials of person taking daily meal count certifying that the information is true and accurate	MH	MH	MH	MH	MH	MH	MH	
SITE SUPERVISOR: By signing, I certify that the above information is true and accurate.								
Signature							Date	3/13/21
This institution is an equal opportunity provider.								

32. According to MDE records, MEKFIRA HUSSEIN's sites claimed to have served more than 3.4 million meals to children in 2020 and 2021, which includes purportedly serving approximately 1.7 million meals at the 2885 Brookdale Drive site. In all, Shamsia Hopes claimed that it was entitled to more than \$9.5 million in Federal Child Nutrition Program reimbursement funds. Shamsia Hopes received approximately \$6,842,590 directly from Feeding Our Future in between approximately December 2020 and November 2021. For its part, Feeding Our Future retained approximately \$948,000 in "administrative fees" for sponsoring Shamsia Hopes.

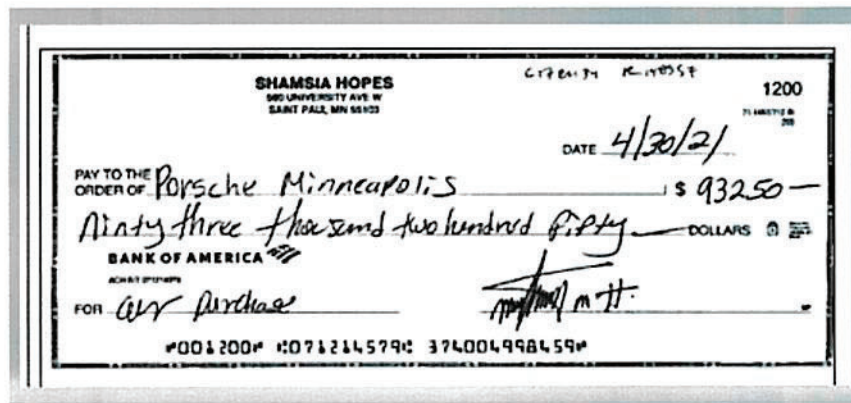
33. Despite these claims of providing thousands of meals, there is no indication that MEKFIRA HUSSEIN's site for Shamsia Hopes at 2885 Brookdale Drive in Brooklyn Park, Minnesota, served the children for which it claimed reimbursement. For example, in or about July 2022, MDE contacted Bock and inquired whether Shamsia Hopes was actually providing food at the Brookdale site

since recent site visits revealed “no signage” and “no one at the site seems to know anything about a food program there.”



34. In 2022, as part of this federal investigation, agents visited 2885 Brookdale Drive in Brooklyn Park, Minnesota, the site where MEKFIRA HUSSEIN purportedly provided food through the Federal Child Nutrition Program in 2020 and 2021. Investigators spoke with E.A., the landlord of the location at 2885 Brookdale Drive, who confirmed the address was actually for a supermarket operated by E.A. Among other things, E.A. told agents that he has never heard of Shamsia Hopes and that no one has ever distributed food from E.A.'s location at 2885 Brookdale Drive. When an agent presented a photograph of MEKFIRA HUSSEIN, E.A. said he did not recognize her.

35. A review of MEKFIRA HUSSEIN's bank accounts reveals that she spent a small fraction of the Federal Child Nutrition Program reimbursement funds on food for children. Instead, MEKFIRA HUSSEIN spent much of the approximately \$6.8 million in proceeds on personal expenditures for herself and her family, such as vehicles. For example, on or about April 30, 2021, MEKFIRA HUSSEIN purchased a 2021 Porsche Cayenne vehicle using at least \$93,250 in funds from Shamsia Hopes.



Car dealership records show that MEKFIRA HUSSEIN purchased the Porsche Cayenne vehicle in the name of "Shamsia Hopes," rather than in her own name.

36. In addition, MEKFIRA HUSSEIN's bank account records show that she diverted at least \$150,000 in Federal Child Nutrition Program reimbursement funds to herself as well as thousands of dollars to Tesla Motors. According to vehicle registration records, HUSSEIN was the registered owner of a 2021 Tesla Model 3 vehicle as of approximately January 2021 but then the title was transferred to her apparent spouse in or about June 2022.

37. MEKFIRA HUSSEIN's bank account records also show that she diverted at least \$4 million in Federal Child Nutrition Program funds to "Oromia Feeds LLC," a purported food vendor for Shamsia Hopes.

38. According to Minnesota Secretary of State records, A.U.H. registered Oromia Feeds LLC on or about December 5, 2020. Based upon agents' review of database records, A.U.H. is the apparent husband of MEKFIRA HUSSEIN. In the registration records for Oromia Feeds LLC with the State of Minnesota, A.U.H. listed himself as the manager with a mailing address at 6142 Oxford Road North in Shakopee, Minnesota. As noted above, this is the home address for MEKFIRA HUSSEIN.

39. Despite paying Oromia Feeds LLC at least \$4 million from Shamsia Hopes, the bank account records for Oromia Feeds LLC show that it spent a small fraction of its money on food. Instead, Oromia Feeds LLC diverted hundreds of thousands of dollars on expenditures unrelated to food for children, such as at least \$1 million to A.U.H. (HUSSEIN's apparent husband), at least \$61,000 to Luther Brookdale Chevrolet, approximately \$52,000 to Boyer Trucks, approximately \$46,000 to Roesch Ford, and at least \$173,000 to Pennymac Loan Services.

E. MEKFIRA HUSSEIN Paid Kickbacks to a Feeding Our Future Employee

40. Shamsia Hopes and its president, MEKFIRA HUSSEIN, paid more than \$80,000 in kickbacks to Eidleh, a Feeding Our Future employee. A review of Eidleh's bank accounts for Bridge Logistics LLC and Bridge Consulting and Logistics LLC showed that the companies were shells created and used by Eidleh to receive and conceal kickbacks from sites participating in the Federal Child Nutrition Program under the sponsorship of Feeding Our Future.

41. For example, on or about December 2, 2020, HUSSEIN wrote a check for \$2,500 from Shamsia Hopes to Bridge Consulting and Logistics LLC, one of the shell companies that Eidleh created and used to conceal his kickback payments.

42. On or about January 8, 2021, HUSSEIN wrote a check for \$18,000 from Shamsia Hopes to Eidleh's Bridge Logistics LLC, another one of the shell companies that Eidleh created and used to conceal his kickback payments.

43. On or about January 18, 2021, HUSSEIN wrote another check for \$30,000 from Shamsia Hopes to Eidleh's Bridge Logistics LLC.

44. On or about May 8, 2021, HUSSEIN wrote a check for \$30,000 from Shamsia Hopes to Eidleh's Bridge Consulting and Logistics LLC.

45. Through Oromia Feeds LLC, HUSSEIN's apparent husband, A.U.H., also paid kickbacks to Eidleh. For example, on or about February 22, 2021, A.U.H. wrote a check for \$30,080 from Oromia Feeds LLC to Eidleh's Bridge Logistics LLC. In addition, on or about March 15, 2021, HUSSEIN's apparent husband wrote a check for \$30,000 from Oromia Feeds LLC to Eidleh's Bridge Consulting and Logistics LLC.

II. CONCLUSION

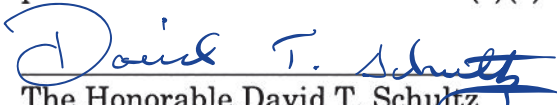
46. Based on the facts set forth above, and based on my training, experience, knowledge, and the aforementioned facts of this investigation, there is probable cause to believe that MEKFIRA HUSSEIN has violated 18 U.S.C. § 666 (federal programs bribery).

Respectfully submitted,



FBI Special Agent Travis Wilmer

SUBSCRIBED and SWORN before me by reliable
electronic means (FaceTime, Zoom and/or email)
pursuant to Fed. R. Crim. P. 41(d)(3)



The Honorable David T. Schultz
United States Magistrate Judge

September 19, 2022